

Exhibit 2

Subject: RE: Zackary Ellis Sanders - evidence review requested for MAY 18 from 9AM to 1PM
Date: Tuesday, May 18, 2021 at 11:52:40 AM Eastern Daylight Time
From: Clayman, William G (USAVAE)
To: McCaffrey, Sean (USMS), Jade Chong-Smith, Nazaire, Villiere (USMS), Temple, Aimee (USAVAE)
CC: Nina Ginsberg, Jon Jeffress, Zachary Deubler, Schlessinger, Seth (USAVAE), Prabhu, Jay (USAVAE)

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Zackary Sanders has been placed on the take-out list for tomorrow.

Bill

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From: McCaffrey, Sean (USMS) <SMcCaffrey@usms.doj.gov>
Sent: Tuesday, May 18, 2021 11:42 AM
To: Jade Chong-Smith <jchong-smith@kaiserdillon.com>; Nazaire, Villiere (USMS) <VNazaire@usms.doj.gov>; Clayman, William G (USAVAE) <WClayman@usa.doj.gov>; Temple, Aimee (USAVAE) <ATemple@usa.doj.gov>
Cc: Nina Ginsberg <nginsberg@dimuro.com>; Jon Jeffress <jjeffress@kaiserdillon.com>; Zachary Deubler <zdeubler@dimuro.com>; Schlessinger, Seth (USAVAE) <sschlessinger1@usa.doj.gov>; Prabhu, Jay (USAVAE) <JPrabhu@usa.doj.gov>
Subject: RE: Zackary Ellis Sanders - evidence review requested for MAY 18 from 9AM to 1PM

The USMS is prepared to bring Zackary Ellis Sanders to the Courthouse tomorrow for the evidence review.

This is a request for the USAO to put Zackary Sanders on the Court Come Up/Agent Take Out list for tomorrow, which is communicated to our office daily via email from Aimee Temple.

Thank you,

Sean P. McCaffrey
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U.S. Marshals Service | Eastern District of Virginia
Alexandria Division
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From: Jade Chong-Smith <jchong-smith@kaiserdillon.com>
Sent: Tuesday, May 18, 2021 11:18 AM
To: Nazaire, Villiere (USMS) <VNazaire@usms.doj.gov>; McCaffrey, Sean (USMS) <SMcCaffrey@usms.doj.gov>; Clayman, William G (USAVAE) <WClayman@usa.doj.gov>

Cc: Nina Ginsberg <nginsberg@dimuro.com>; Jon Jeffress <jjeffress@kaiserdillon.com>; Zachary Deubler <zdeubler@dimuro.com>; Schlessinger, Seth (USAVAE) <sschlessinger1@usa.doj.gov>; Prabhu, Jay (USAVAE) <JPrabhu@usa.doj.gov>

Subject: Zackary Ellis Sanders - evidence review requested for MAY 18 from 9AM to 1PM

Hello,

We write to request that Zackary Ellis Sanders be brought to the Courthouse for an evidence review in the cellblock **tomorrow, May 19, for the review to begin at 9AM and to conclude at 1PM.**

We understand that Mr. McCaffrey and Mr. Nazaire spoke with Mr. Clayman last week, where they explained that evidence reviews had been scheduled for Mr. Sanders between the defense and the U.S. Marshals on Friday, May 14, and Tuesday, May 18, and that prior to each review, the government would need to add Mr. Sanders's name to the agent takeout/court come up list for those dates. The government did so prior to Friday's review, but did not do so prior to Tuesday's review, as the U.S. Marshals had requested, and as a result, Mr. Sanders was not brought to the Courthouse today for the review beginning at 9AM, as the defense and U.S. Marshals had expected and prepared for.

Could the government and U.S. Marshals please confirm whether this review can be conducted tomorrow, and if Mr. Sanders will be transported from ADC for the evidence review to begin at 9AM and to conclude at 1PM? The hearing for Friday, May 21, was scheduled for the Court to check on the status of the evidence reviews and whether its order needed to be modified. The defense requests the opportunity to review evidence with Mr. Sanders tomorrow to be able to make a more fulsome report to the Court on Friday.

Zachary Deubler would be the member of the defense team attending the review tomorrow, if it can be scheduled.

Thank you,

Jade

Jade Chong-Smith

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